

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TYSEN GLUNZ,

Plaintiff,

-vs-

ADM ARTCO,

Defendant.

FILED: MARCH 24, 2008
08CV1693 EDA
Case No: JUDGE BUCKLO
MAGISTRATE JUDGE COLE

O'BRYAN BAUN COHEN KUEBLER KARAMANIAN
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-and-

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COMPLAINT

NOW COMES Plaintiff, by and through counsel undersigned, O'BRYAN BAUN COHEN
KUEBLER KARAMANIAN, complaining against Defendant as follows:

1. Jurisdiction and venue lie in this action, Defendant conducting business within this forum's boundaries.

2. Jurisdiction is founded under the Jones Act (46 USCA 30104) for negligence, and under the General Maritime Law for unseaworthiness, maintenance, cure and wages.

3. At all times material to issues herein Plaintiff served as an employee of Defendant serving as a crew member aboard its vessels, with all acts and/or omissions giving rise to this action occurring in the course of Plaintiff's employment in the service of his ship.

4. On or about September 22, 2007, Plaintiff was in the course of employment in proximity to an unsecured manhole cover when as a result thereof he fell there through resulting in injury because of said failure to provide a safe place to work and seaworthy vessel.

5. Defendant's tortious acts aforesaid caused or contributed to Plaintiff's damages, **inter alia**, as follows:

- a. Pain and suffering, past, present and future;
- b. Mortification, humiliation, fright shock and embarrassment;
- c. Loss of earnings and earning capacity;
- d. Hospital, pharmaceutical and other cure expenses;
- e. Aggravation of prior condition, if any there be;
- f. Inability to engage in social, recreational, and other pursuits previously enjoyed;
- g. Mental anguish;
- h. Found;

i. Maintenance, cure, wages and/or attorney fees.

WHEREFORE, Plaintiff demands trial by jury and judgment against Defendant, together with interest, costs, attorney fees and expenses, all to be methodically adjusted upwards during the pendency of this cause.

O'BRYAN BAUN COHEN KUEBLER
KARAMANIAN

/s/ Dennis M. O'Bryan

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/s/ Frederic Mendelsohn (w/ consent)

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Dated: March 20, 2008

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Case No:

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_____/

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_____/

DEMAND FOR TRIAL BY JURY

_____/ NOW COMES Plaintiff by and through counsel undersigned, O'BRYAN BAUN COHEN KUEBLER KARAMANIAN, and hereby demands trial by jury in the above-referenced cause of action.

O'BRYAN BAUN COHEN KUEBLER
KARAMANIAN

/s/ Dennis M. O'Bryan

DENNIS M. O'BRYAN (P30545)

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